Remarks

Claims 1-31 are pending.

Allowable Subject Matter

Claims 6, 9, 16, 17, 27 and 30 were objected to as being dependent on a rejected base claim but would be allowable if rewritten in independent form. For the reasons detailed below, Applicants believe the rejection of the base claims should be withdrawn. Therefore, Applicants have elected not to rewrite Claims 6, 9, 16, 17, 27 and 30 at this time.

Rejections Based On Tesch

Claims 1-5, 7, 10-15, 18, 19, 21-26, 28 and 31 were rejected under Section 102(e) as being anticipated by Tesch (2002/0116416). Claims 8, 20 and 29 were rejected under Section 103 as being obvious over Tesch in view of well known prior art. The rejections are based on the Office's assertion that Tesch teaches (1) converting information corresponding to a document to image data having an object group and then (2) converting the image data, according to a set of format rules, to data representative of the document exhibiting a second format. This assertion is not correct.

Claim 1 recites a method for converting a document from a first format to a second format. Tesch teaches converting an object embedded in a document from one format to another format. The teachings of Tesch, therefore, are relevant to the method of Claim 1 only if the embedded object in Tesch is deemed to be the claimed document. As will be demonstrated below, Tesch's method for converting an embedded object does not include all of the elements recited in Claim 1, even if it is assumed the embedded object is a document for purposes of the method of Claim 1.

Tesch teaches converting an object, formula 310 for example, embedded in a target document, text document 290 for example, from one format to another format. Tesch, Fig. 3 and paragraph [0055]. In the example given, text document 290 is a Microsoft Word file and formula 310 is a Microsoft Equation Editor file. If Microsoft Equation Editor is not available to a user wishing to edit equation 310 in target document 290, then equation 310 is converted to a format that is available to the user. In the example given in Tesch, equation 310 is converted from Microsoft Equation Editor to StarOffice Math "using a StarOffice Math import filter that imports

Microsoft Equation objects into the StarOffice Math object format ...." Tesch, paragraph [0081]. The details of the import operation for StarOffice Math are described in paragraph [0086] — "the import filter will read the embedded object data content of the embedded object data and place the embedded object data content into the proper place in the newly created embedded object structure ...." A similar process is described for converting an embedded object from HTML to ASCII in paragraphs [0087] through [0094].

There is nothing in the description of either the Microsoft Equation Editor to StarOffice Math conversion or the HTML to ASCII conversion that teaches or even suggests the two step conversion process of Claim 1 — converting the embedded object from its first format to image data having at least one object group and then converting that image data with its at least one object group to the second format. On the contrary, as detailed above, Tesch teaches a direct conversion in which the content is lifted from the first format and placed in the second format. If the Office disagrees, it is respectfully requested to specifically point out *and explain* those passages in Tesch that teach the claimed two step conversion process. Absent such a showing, the rejection should be withdrawn.

The Office incorrectly asserts at page 3 of the Office Action that "object groups 110, 120 and 130" are somehow equivalent to the claimed image data having at least one object group. Object groups 110, 120 and 130 in Tesch are simply examples of the objects embedded in a target document that may be converted from a first format to a second format according to the conversion technique discussed at length above. Object group 130, for example, is an equation such as equation 310 used in the detailed description of Tesch's conversion technique.

For these reasons, Claim 1 is felt to distinguish patentably over Tesch or Tesch in view of well known prior art. For these same reasons, Claims 11 and 22, which are system and computer medium counterparts to Claim 1, are also felt to distinguish patentably over the cited art. Claims 2-10, 12-21 and 23-31 distinguish over the art due to their dependence on Claims 1, 11 and 22, respectively.

Further with regard to Claim 2 (and counterpart Claims 19 and 23), which recites that the image data exhibits an intermediate format, Tesch does not utilize any such intermediate format. Rather, Tesch teaches a direct conversion in which

the content is lifted from the first format and placed in the second format, Microsoft Equation Editor to StarOffice Math or HTML to ASCII for example.

Further with regard to Claim 3 (and counterpart Claims 14 and 24), which recites providing a conversion library capable of converting information corresponding to the first document to image data, the mapping tables in Tesch map the first format directly to the second format, not from the first format to any intermediate image data and then to the second format.

Further with regard to Claim 4 (and counterpart Claim 25), which recites the added steps of analyzing the image data, producing enhanced image data and then converting the enhanced image data, Tesch cannot and does not teach these additional steps because, as detailed above, he does not even teach converting the first format into image data that is then converted to the second format.

The foregoing is believed to be a complete response to the outstanding office action.

Respectfully submitted,

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